

DUANE MORRIS LLP
Gregory P. Gulia
1540 Broadway
New York, New York 10036-4086
(212) 692-1000

Attorneys for Defendant Charles Wells

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| UNITED STATES OF AMERICA, | : | S4-05-CR.1067 (KMK) |
| Plaintiff, | : | NOTICE OF MOTION FOR |
| -against- | : | ADMISSION <i>PRO HAC VICE</i> OF |
| CHARLES WELLS, et al., | : | JOSEPH M. BURTON |
| Defendant. | : | |


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PLEASE TAKE NOTICE that, upon the annexed Declaration of Gregory P. Gulia on January 11, 2008, defendant Charles Wells, et al. will move this Court before the Honorable Kenneth M. Karas, at the United States District Court, 500 Pearl Street, New York 10007, for an order pursuant to Local Civil Rule 1.3(c) granting the admission *pro hac vice* of

Joseph M. Burton
Duane Morris LLP
One Market, Spear Tower
Suite 2000
San Francisco, CA 94105-1104
(415) 957-3014
Email: JMBurton@duanemorris.com

to practice before this Court in the above captioned action. Joseph M. Burton is a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings against Joseph M. Burton in any State or Federal court.

Dated: New York, New York
January 14, 2008



GREGORY P. GULIA

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1540 Broadway
New York, New York 10036-4086
(212) 692-1000

Attorneys for Defendant Charles Wells

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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|---------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA, | : | S4-05-CR.1067 (KMK) |
| | : | |
| Plaintiff, | : | DECLARATION OF |
| | : | GREGORY P. GULIA |
| -against- | : | IN SUPPORT OF MOTION |
| | : | FOR ADMISSION |
| CHARLES WELLS, et al., | : | <i>PRO HAC VICE</i> |
| | : | |
| Defendant. | : | |

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STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

GREGORY P. GULIA, under penalty of perjury, hereby declares:

1. I am a partner of the firm Duane Morris LLP, counsel for defendant Charles Wells, et al. in the above-captioned action. I am fully familiar with the facts contained herein. I submit this motion, pursuant to Local Civil Rule 1.3(c), for an order admitting *pro hac vice* Joseph M. Burton to practice before this Court in the above-captioned action.

2. I am a member in good standing of the bar of the State of New York and am admitted to the bar of the United States District Court for the Southern District of New York. I am in good standing with this court.

3. My partner, Joseph M. Burton, is a member in good standing of the State Bar of California. An original Certificate of Good Standing issued by the State Bar of California within the last thirty days is annexed as Exhibit A.

4. Joseph M. Burton is a skilled attorney and a person of high integrity. He is experienced in federal practice and is familiar with the Federal Rules of Criminal Procedure.

5. I respectfully submit a proposed order granting the admission of Joseph M. Burton *pro hac vice*, annexed as Exhibit B.

WHEREFORE, it is respectfully requested that this Court admit *pro hac vice* Joseph M. Burton to practice before this Court in the above-captioned action.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York

January 14, 2008



GREGORY P. GULIA



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

January 8, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JOSEPH MONROE BURTON, #142105 was admitted to the practice of law in this state by the Supreme Court of California on December 11, 1989; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Custodian of Membership Records

DUANE MORRIS LLP
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Attorneys for Defendant Charles Wells

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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|---------------------------|---|---|
| UNITED STATES OF AMERICA, | : | S4-05-CR.1067 (KMK) |
| | : | |
| Plaintiff, | : | [PROPOSED] ORDER FOR |
| | : | ADMISSION <i>PRO HAC VICE</i> OF |
| -against- | : | JOSEPH M. BURTON |
| | : | |
| CHARLES WELLS, et al., | : | |
| | : | |
| Defendant. | : | |

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Upon consideration of the motion of Gregory P. Gulia, attorney for defendant Charles Wells, et al. and said sponsor attorney's affidavit in support of;

IT IS HEREBY ORDERED that

Joseph M. Burton
Duane Morris LLP
One Market, Spear Tower
Suite 2000
San Francisco, CA 94105-1104
(415) 957-3014
Email: JMBurton@duanemorris.com

is hereby admitted *pro hac vice* to practice before this Court in the above-captioned action.

SO ORDERED:

Dated: _____

Honorable Kenneth M. Karas
United States District Judge

CERTIFICATE OF SERVICE

This is to certify that I caused the foregoing Notice of Motion for Admission *Pro Hac Vice* of Joseph M. Burton, Declaration of Gregory P. Gulia in Support of Motion for Admission *Pro Hac Vice* of Joseph M. Burton, and Proposed Order for Admission *Pro Hac Vice* of Joseph M. Burton to be served on the following individual by first class mail:

Ms. Danya Perry
Assistant United States Attorney
U.S. Attorney's Office
United States District Court
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007

This the 14th day of January 11, 2008.



Vanessa C. Hew